

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Calvin Maurice MILES

Case: 2:24-mj-30190  
Assigned To : Unassigned  
Assign. Date : 5/17/2024  
Description: COMP USA V. MILES  
(KB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 15, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 17, 2024

City and state: Detroit, Michigan



*Complainant's signature*

Kara Klupacs, Special Agent (ATF)

*Printed name and title*



*Judge's signature*

Anthony P. Patti United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, Kara Klupacs, being first duly sworn, hereby depose and state the following:

**INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since March 2018. I am currently assigned to the Detroit Field Division Group 2. I graduated from the Federal Law Enforcement Training Center and ATF Special Agent Basic Training. Prior to becoming a Special Agent, I served eight years as a federal law enforcement officer with U.S. Customs and Border Protection Officer and the U.S. Secret Service Uniformed Division. During my employment with ATF, I have conducted and/or participated in dozens of criminal investigations involving the possession and use of firearms, armed drug trafficking, and criminal street gangs, among other state and federal offenses.

2. I based this affidavit on my personal knowledge, interviews conducted by myself and/or other law enforcement agents, communications with others who had personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is for the limited purpose of establishing probable cause and does not contain all facts known to law enforcement regarding this investigation.

3. Probable cause exists that on May 15, 2024, Calvin Maurice MILES, a convicted felon, knowingly and intentionally possessed a firearm in violation of 18 U.S.C. § 922(g)(1).

**PROBABLE CAUSE**

4. On September 21, 2023, a grand jury returned an indictment charging Calvin MILES with one count of being a felon in possession of a firearm and one count of being a felon in possession of ammunition, both charges in violation of 18 U.S.C. § 922(g)(1) (Case No. 2:23-cr-20545). Later that same day, a federal arrest warrant was issued for MILES and entered into law enforcement databases.

5. On September 29, 2023, and October 1, 2023, ATF attempted to intercept MILES at the Michigan Third Circuit Court, for pretrial hearings unrelated to the federal arrest warrant for MILES. MILES failed to appear for those pretrial hearings. Third Circuit Court Judge Nicholas Hathaway issued a bench warrant for MILES' failure to appear, which remains outstanding. After the ATF's attempts to intercept MILES were not successful, apprehension of MILES for the federal arrest warrant was turned over to the United States Marshal Service (USMS).

6. On May 15, 2024, USMS Agents and Task Force Officers (TFOs), established surveillance at an area on Van Dyke Street in Detroit. Around 12:15 p.m., law enforcement observed MILES, who was wearing a pink backpack, exiting the residence with a female.

7. USMS continued to observe MILES walk from the residence, across Van Dyke and towards a fenced off parking lot. Upon MILES' entry into the parking lot, USMS agents and TFOs activated their overhead lights and attempted to take MILES into custody. When MILES saw the officers, he ran.

8. USMS pursued MILES through the parking lot and down an ally. During the foot pursuit USMS saw MILES take off and throw the pink backpack that he was wearing before entering the alley. Then, USMS saw MILES pull a handgun from his waistband and throw it. Because MILES would not stop fleeing, USMS tased MILES, who was then taken into custody. A holster was recovered from inside of MILES' waistband.

9. The firearm that MILES drew from his waistband was later identified as a Springfield Armory model XD-S, .45 caliber pistol.

10. USMS recovered the pink backpack that had been discarded by MILES during the pursuit. The backpack contained the following:

- a. One Century Arms model VSKA 7.62 caliber pistol,
- b. Five loaded magazines, (including three .45 caliber magazines and two 7.62 caliber magazines), and
- c. A black Coach wallet containing MILES' State of Michigan identification card and MILES' Michigan Bridge Card.

11. I arrived at the scene around 12:45 p.m. and took possession of the items recovered from MILES by the USMS. Additionally, I examined the Century Arms model VSKA 7.62x39mm caliber pistol and the Springfield Armory model XD-S .45ACP caliber pistol. As an ATF Firearm Interstate Nexus agent, it is my opinion that both firearms are firearms as defined under 18 U.S.C. § 921 and were manufactured outside of the state of Michigan after 1898, and therefore have traveled in and affected interstate commerce.

12. I queried MILES in the Law Enforcement Information Network (LEIN), and observed that MILES had the following felony convictions:

- a. Michigan's 3<sup>rd</sup> Circuit Court, December 2010 - Felony Motor Vehicle-Unlawful Driving Away,
- b. Michigan's 3<sup>rd</sup> Circuit Court, January 2018 - Felony Weapons-Carrying Concealed,
- c. Michigan's 3<sup>rd</sup> Circuit Court, February 2018 - Stolen Property Receiving and Concealing-Motor Vehicle,
- d. Michigan's 3<sup>rd</sup> Circuit Court, October 2019 - Police Officer-Assaulting/Resisting/Obstructing.

**CONCLUSION**

13. Probable cause exists that on May 15, 2024, MILES, a convicted felon, knowingly and intentionally possessed a Century Arms model VSKA 7.62x39mm caliber pistol and a Springfield Armory model XD-S .45ACP caliber pistol, in violation of 18 U.S.C. § 922(g)(1). Said violation occurring in the City of Detroit, Michigan, in the Eastern Judicial District of Michigan.

Respectfully submitted,



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Special Agent Kara Klupacs  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me in my presence  
and/or by reliable electronic means.



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HON. ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

Date: May 17, 2024